

EXHIBIT B

James Mitchell

From: Christopher Lee
Sent: Thursday, June 13, 2024 12:05 PM
To: James Mitchell
Subject: FW: MPH v. Apple

From: Malloy, Ryan J. <RMalloy@mofo.com>
Sent: Wednesday, June 12, 2024 6:46 PM
To: Rahebi, Bitra <BRahebi@mofo.com>; Christopher Lee <clee@leesheikh.com>
Cc: Carol Koski <ckoski@leesheikh.com>
Subject: Re: MPH v. Apple

Chris,

MPH may describe its motion as “unopposed” so long as MPH includes the complete position statement that Bitra Rahebi provided in her June 10 email.

Ryan Malloy
Morrison & Foerster LLP
(213) 892-5482

From: Rahebi, Bitra <BRahebi@mofo.com>
Sent: Wednesday, June 12, 2024 2:50:15 PM
To: Christopher Lee <clee@leesheikh.com>
Cc: Carol Koski <ckoski@leesheikh.com>; Malloy, Ryan J. <RMalloy@mofo.com>
Subject: Re: MPH v. Apple

Chris, I am copying Ryan as I just boarded a flight and he can get back to you.

On Jun 12, 2024, at 2:38 PM, Christopher Lee <clee@leesheikh.com> wrote:

External Email

Bitra:

Thanks for your email.

The first issue was addressed in our motion filed yesterday and granted today.

I write to seek clarification on the second issue. You state that “Apple declines to ***stipulate*** to MPH’s request for another CMC,” presumably because I asked whether Apple would stipulate to having a case management conference in our initial call.

MPH intends to proceed with the motion for such a conference shortly, and would like to know if the motion can be filed as “unopposed” as we did with the motion filed yesterday even if Apple will not stipulate to the proposed conference. We will obviously include in the motion Apple’s position.

Thanks.

Christopher J. Lee
Lee Sheikh & Haan LLC
125 South Clark Street, Suite 1175 | Chicago, Illinois 60603
General: (312) 982-0070 | Direct: (312) 982-0061
Website: IPLitigation.com

IAM Strategy 300: The World’s Leading IP Strategists
AV Peer Review Rated, Martindale-Hubbell

THE INFORMATION IN THIS EMAIL COMMUNICATION IS INTENDED SOLELY FOR THE INTENDED AND DESIGNATED RECIPIENT. THIS MESSAGE MAY CONSTITUTE AN ATTORNEY-CLIENT COMMUNICATION OR OTHERWISE BE PRIVILEGED OR CONFIDENTIAL. If the reader of this message is not the intended recipient or an agent responsible for delivering this message to an intended recipient, you received this document in error. Any review, dissemination, distribution, copying or other use of this document is strictly prohibited. If you receive this communication in error, please notify us immediately by telephone and return the original document to us by mail.

From: Rahebi, Bitu <BRahebi@mofo.com>
Sent: Monday, June 10, 2024 3:50 PM
To: Christopher Lee <clee@leesheikh.com>
Cc: Carol Koski <ckoski@leesheikh.com>
Subject: RE: MPH v. Apple

Chris,

I know we were both out of the office when we spoke on Friday. For reference, these are the prior position statements:

Issue #1: Magistrate Judge

Apple defers to the Court’s preference on this issue. In view of its familiarity with this case, the patents, and MPH’s prior motions, Apple believes that the Court is well equipped to resolve the pending discovery disputes.

Issue #2: Further CMC

Apple notes that the Court already set a complete schedule for the case through trial (ECF No. 83). Apple defers to the Court on its management of the case. For these reasons, Apple declines to stipulate to MPH’s request for another CMC.

Issue #3: Expedited briefing on motions related to issue number 1 and 2.

Apple opposes the motion for expedited briefing.

Best,
Bita

From: Christopher Lee <cle@leesheikh.com>
Sent: Thursday, June 6, 2024 8:49 AM
To: Rahebi, Bita <BRahebi@mofo.com>
Cc: Carol Koski <ckoski@leesheikh.com>
Subject: RE: MPH v. Apple

External Email

Sure thing.

Christopher J. Lee
Lee Sheikh & Haan LLC
125 South Clark Street, Suite 1175 | Chicago, Illinois 60603
General: (312) 982-0070 | Direct: (312) 982-0061
Website: PLitigation.com

IAM Strategy 300: The World's Leading IP Strategists
AV Peer Review Rated, Martindale-Hubbell

THE INFORMATION IN THIS EMAIL COMMUNICATION IS INTENDED SOLELY FOR THE INTENDED AND DESIGNATED RECIPIENT. THIS MESSAGE MAY CONSTITUTE AN ATTORNEY-CLIENT COMMUNICATION OR OTHERWISE BE PRIVILEGED OR CONFIDENTIAL. If the reader of this message is not the intended recipient or an agent responsible for delivering this message to an intended recipient, you received this document in error. Any review, dissemination, distribution, copying or other use of this document is strictly prohibited. If you receive this communication in error, please notify us immediately by telephone and return the original document to us by mail.

From: Rahebi, Bita <BRahebi@mofo.com>
Sent: Wednesday, June 5, 2024 11:00 PM
To: Christopher Lee <cle@leesheikh.com>
Cc: Carol Koski <ckoski@leesheikh.com>
Subject: RE: MPH v. Apple

Hi Chris,

11:10 works for me. Do you want to give me a ring at the below? It should roll over to my cell.

Bita Rahebi
Partner | Co-Chair, Global Intellectual Property Litigation Practice
brahebi@mofo.com
T. +1 (213) 892-5428

**MORRISON
FOERSTER**

From: Christopher Lee <cleee@leesheikh.com>
Sent: Wednesday, June 5, 2024 6:53 PM
To: Rahebi, Bitra <BRahebi@mofo.com>
Cc: Carol Koski <ckoski@leesheikh.com>
Subject: Re: MPH v. Apple

External Email

I am out of the office then, but could make 11:10-11:30 am PT work.

Thanks.

Chris

Sent iPhone

On Jun 5, 2024, at 7:38 PM, Rahebi, Bitra <BRahebi@mofo.com> wrote:

Hi Chris, sorry, I was tied up in meetings. Does 10:30-11:30 pacific tomorrow work for you?

From: Christopher Lee <cleee@leesheikh.com>
Sent: Wednesday, June 5, 2024 2:07 PM
To: Rahebi, Bitra <BRahebi@mofo.com>
Subject: Re: MPH v. Apple

External Email

Yes. I can talk after 2:30 pm PT.

Chris

Sent iPhone

On Jun 5, 2024, at 12:19 PM, Rahebi, Bitra <BRahebi@mofo.com> wrote:

Hi Chris, time to connect today?

From: Christopher Lee <clee@leesheikh.com>
Sent: Friday, May 31, 2024 12:50 PM
To: Rahebi, Bitra <BRahebi@mofo.com>
Cc: Carol Koski <ckoski@leesheikh.com>
Subject: Re: MPH v. Apple

External Email

Bitra:

Thanks for the prompt response. I have a doctor's appointment at 10 am PT.on Monday. Can you do 9:30 PT or later in the afternoon (say, after 1 pm PT)?

Chris

Sent iPhone

On May 31, 2024, at 10:00 AM, Rahebi, Bitra
<BRahebi@mofo.com> wrote:

Hi Chris,

Sure. How is 10 a.m. pacific on Monday?

Bitra

From: Christopher Lee <clee@leesheikh.com>
Sent: Friday, May 31, 2024 6:17 AM
To: Rahebi, Bitra <BRahebi@mofo.com>
Cc: Carol Koski <ckoski@leesheikh.com>
Subject: MPH v. Apple

External Email

Bitra:

Are you available for a short call this afternoon (after 2 pm PT) or on Monday to discuss a couple of case management issues?

Thanks.

Christopher J. Lee
LEE SHEIKH & HAAN
125 South Clark Street, Suite 1175
Chicago, Illinois 60603
Office: (312) 982-0070
Direct: (312) 982-0061
Cell: (312) 835-8383
www.iplitigation.com
IAM Strategy 300: World's Leading IP Strategists

THE INFORMATION IN THIS EMAIL
COMMUNICATION IS INTENDED SOLELY
FOR THE INTENDED AND DESIGNATED
RECIPIENT. THIS MESSAGE MAY
CONSTITUTE AN ATTORNEY-CLIENT
COMMUNICATION OR OTHERWISE BE
PRIVILEGED OR CONFIDENTIAL.

=====
=====

This message may be confidential and privileged. Use or
disclosure by anyone other than an intended addressee
is prohibited. If you received this message in error,
please delete it and advise the sender by reply email.
Learn about Morrison & Foerster LLP's [Privacy Policy](#).

=====
=====

This message may be confidential and privileged. Use or disclosure by
anyone other than an intended addressee is prohibited. If you received
this message in error, please delete it and advise the sender by reply
email. Learn about Morrison & Foerster LLP's [Privacy Policy](#).

=====
=====

This message may be confidential and privileged. Use or disclosure by anyone other than
an intended addressee is prohibited. If you received this message in error, please delete
it and advise the sender by reply email. Learn about Morrison & Foerster LLP's [Privacy
Policy](#).

=====
===

This message may be confidential and privileged. Use or disclosure by anyone other than an intended addressee is prohibited. If you received this message in error, please delete it and advise the sender by reply email. Learn about Morrison & Foerster LLP's [Privacy Policy](#).

.

=====
===

This message may be confidential and privileged. Use or disclosure by anyone other than an intended addressee is prohibited. If you received this message in error, please delete it and advise the sender by reply email. Learn about Morrison & Foerster LLP's [Privacy Policy](#).

.

=====

This message may be confidential and privileged. Use or disclosure by anyone other than an intended addressee is prohibited. If you received this message in error, please delete it and advise the sender by reply email. Learn about Morrison & Foerster LLP's [Privacy Policy](#).

.